

### **INTERROGATORIES**

1. When, how, and under what circumstances did you first become aware that Old GM had filed for bankruptcy?
2. When, how, and under what circumstances did you first become aware of the Bar Date in the Old GM bankruptcy?
3. When, how, and under what circumstances did you first become aware that Your Vehicle was subject to NHTSA Recall No. 14v047?
4. When did you first learn that Your Vehicle might have a defect that may cause an Ignition Switch Related Event?
5. Did you bring Your Vehicle to a dealer, a repair shop, or a mechanic as a result of what you now allege to be a defect related to the ignition switch or an Ignition Switch Related Event?
6. If the answer to number 5 is yes, when was the first time that you brought Your Vehicle to a dealer, a repair shop, or a mechanic as a result of what you now allege to be a defect related to the ignition switch or an Ignition Switch Related Event?
7. Did you communicate with Old GM or New GM about what you now allege to be a defect related to the ignition switch or an Ignition Switch Related Event?
8. If the answer to number 7 is yes, when did you first communicate with Old GM or New GM, and how did you so communicate (telephone contact, e-mail, letter or other), about what you now allege to be a defect related to the ignition switch or an Ignition Switch Related Event?
9. ~~Did you bring Your Vehicle to a dealer, a repair shop, or a mechanic as a result of what you now believe to be or was a defect (other than a defect related to the ignition switch)?~~
10. ~~If the answer to number 9 is yes, when was the first time that you brought Your Vehicle to a dealer, a repair shop, or a mechanic as a result of what you believed to be or was a defect (other than a defect related to the ignition switch)?~~
11. ~~Did you communicate with Old GM or New GM about what you now allege to be a defect (other than a defect related to the ignition switch)?~~
12. ~~If the answer to number 11 is yes, when did you first communicate with Old GM or New GM, and how did you so communicate (telephone contact, e-mail, letter or other), about what you now allege to be a defect (other than a defect related to the ignition switch) or any other issue with Your Vehicle’s performance?~~
- 13.9. When did you acquire Your Vehicle and from whom did you acquire it?

- 14.10. Do you or any member of your family still own or lease Your Vehicle and, if not, when did you transfer Your Vehicle or cease to own or lease it?
- 15.11. When did you first consider consulting with an attorney concerning what you now allege to be a defect related to the ignition switch or an Ignition Switch Related Event~~Your Vehicle~~?
- 16.12. When was the first time that any attorney contacted you, or you contacted any attorney, concerning what you now allege to be a defect related to the ignition switch or an Ignition Switch Related Event~~Your Vehicle, Old GM, or New GM~~?
- 17.13. When were you first represented by a lawyer in connection with what you now allege to be a defect related to the ignition switch or an Ignition Switch Related Event~~Your Vehicle, Old GM, or New GM~~?
- 18.14. When did you first believe that you may have a claim against Old GM concerning what you now allege to be a defect related to the ignition switch or an Ignition Switch Related Event~~and what was that claim~~?
- 19.15. When did you first learn that the GUC Trust was making distributions to Old GM creditors?
- 20.16. When did you first see a draft of your Proof of Claim?
- 21.17. When did you sign your Proof of Claim?
- 22.18. When, if at all, were you involved in an accident involving Your Vehicle concerning what you now allege to be a defect related to the ignition switch or an Ignition Switch Related Event~~as a result of what you believe to be a defect in Your Vehicle~~?
- 23.19. Please explain your initial understanding of the cause of your accident.
- 24.20. Please explain how, if at all, your initial understanding of the cause of your accident has changed over time, and when and why your understanding changed.
- 25.21. If you applied to participate in the compensation fund established by New GM and administrated by Kenneth Feinberg, what was the outcome of that application?
- 26.22. Other than the Proof of Claim you seek to file in connection with the motion filed on December 22, 2016 (Dkt No. 13807), have you previously filed a Proof of Claim in the Old GM bankruptcy?
- 27.23. Have you ever filed an insurance claim with respect to Your Vehicle concerning what you now allege to be a defect related to the ignition switch or an Ignition Switch Related Event and, if so, when, for how much, and under what circumstances did you make your

claim?

| ~~28.~~24. If the answer to number 27 is yes, what was the result of the insurance claim that you filed?